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June 22, 2007

VIA OVERNIGHT MAIL

MEMO ENDORSED

Hon. Charles L. Brieant  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: *The Guardian News v. Michael J. Marino, et al.*

Docket No.: 07-CV-2862 (CLB)

Our File No.: 07-344

*The Guardian News v. Town of New Castle, et al.*

Docket No.: 07-CV-3812 (CLB)

Our File No.: 07-382

*The Guardian News v. Village of Pelham, et al.*

Docket No.: 07-CV-3813 (CLB)

Our File No.: 07-381

Dear Judge Brieant:

We represent the defendants in the above-referenced matters.

Pursuant to Your Honor's Individual Rules and the Court's June 1, 2007 Scheduling Order, defendants must complete the deposition of the plaintiff on the limited issue of qualified immunity by July 2, 2007. We write upon the consent of plaintiff's counsel to request a three week extension of that deadline.

In this regard, plaintiff's counsel advised that he is unavailable next week and the week after is the July 4<sup>th</sup> holiday, making scheduling difficult. In addition, this firm is handling five

Application granted &  
SO ORDERED  
June 25, 2007  
Charles L. Brieant  
USDJ

**MIRANDA SOKOLOFF SAMBURSKY SLONE VERVENIOTIS LLP**

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**HON. CHARLES L. BRIEANT  
JUNE 22, 2007  
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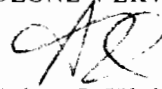
other similar suits filed by the plaintiff against various municipalities. As per the Court's directive at the Initial Conference, we have engaged in discussions with the plaintiff's counsel regarding the possibility of resolving some of the controversies before the court. We respectfully submit that this brief extension will not result in a significant delay in the litigation and will also allow the parties to continue their efforts in this regard before incurring extensive litigation costs.

This is the parties' first request for an extension in this regard.

Thank you for your consideration of this matter.

Respectfully submitted,

**MIRANDA SOKOLOFF SAMBURSKY  
SLONE VERVENIOTIS LLP**



Adam I. Kleinberg

cc: Jonathan Lovett, Esq. (via fax)